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10 *Attorneys for Ocwen Loan Servicing, LLC*

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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

IN RE:  
CHRISTOPHER MICHAEL MARINO, and  
VALERIE MARGARET MARINO,  
Debtors

Case No.: 13-50461-BTB  
Chapter 7  
**OPPOSITION TO MOTION FOR  
ORDER TO COMPEL PAYMENT OF  
ATTORNEY FEES**

COMES NOW, secured creditor OCWEN LOAN SERVICING, LLC (“Ocwen”) and  
hereby opposes Debtors CHRISTOPHER MICHAEL MARINO and VALERIE MARGARET  
(collectively “Debtors”) MARINO Motion for Order to Compel Payment of Attorney Fees.

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This Opposition is based on the pleadings and papers on file with this Court, any facts subject to judicial notice, any argument this Court might consider, and any evidence this Court might entertain.

Dated: January 6, 2017

WRIGHT, FINLAY & ZAK, LLP

/s/ Christopher A.J. Swift, Esq.

Edgar C. Smith, Esq.  
Nevada Bar No. 5506  
Christopher Alan James Swift, Esq.  
Nevada Bar No. 11291  
7785 W. Sahara Avenue, Suite 200  
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*Attorneys for Ocwen Loan Servicing, LLC*

## I. INTRODUCTION

Debtors' Motion conveniently omits key facts: (1) that beginning on November 7, 2016, Ocwen requested that Debtors' counsel provide a W-9 to issue payment; (2) that Debtors' counsel refused to provide one on the day that payment was due, November 28, 2016; (3) Ocwen and its counsel worked diligently to remit payment to Debtors' counsel without a W-9 after learning about this refusal; and (4) payment was made to Debtors' counsel, in its entirety, on December 15, 2016. Had Debtors' counsel told Ocwen that he refused to provide a W-9 on November 7, 2016, instead of ignoring emails no less than three times, the instant Motion would not be necessary. Furthermore, payment has been made and counsel was advised that payment was forthcoming, negating any need for the instant Motion.

## II. FACTUAL STATEMENT

Debtors' Motion is an unnecessary attempt to extort additional fees from Ocwen. Beginning on November 7, 2016, counsel for Ocwen requested a W-9 to issue payment. (See **Exhibit 1**, attached hereto). On November 8, 2016, Ocwen's counsel, having received no response, again requested a W-9 to issue payment. (See **Exhibit 2**, attached hereto). Ocwen's counsel received no response to this email. On November 17, 2016, Ocwen's counsel again

1 followed up with another email, but still was ignored. (See **Exhibit 3**, attached hereto). On  
 2 November 28, 2016, the day payment was due, counsel for creditor again requested a W-9. (See  
 3 **Exhibit 4** attached hereto). In the afternoon, Debtors' counsel finally responded and indicated  
 4 he would not provide a W-9. (See **Exhibit 5** attached hereto). Ocwen was forced to take  
 5 additional procedural steps to deliver payment to Debtors' counsel due to this untimely refusal.  
 6 (See Declaration of Christopher A.J. Swift, Esq., attached hereto). These additional steps  
 7 included receiving authorization from Ocwen's various departments and the issuing of the check  
 8 to Ocwen's counsel's office. The check was issued on December 9, 2016, and received by  
 9 Ocwen's counsel on December 12, 2016, due to the intervening weekend. (See copy of check,  
 10 attached hereto as **Exhibit 6**). On December 12, 2016, Ocwen's counsel called Debtors' counsel  
 11 and left a message indicating that the check was on its way to his office. (See Declaration fo  
 12 Christopher A.J. Swift, Esq., attached hereto). Ocwen's counsel, located in Las Vegas, Nevada,  
 13 sent the check to Nationwide Legal, LLC for deliver on December 13, 2016, to Debtors'  
 14 counsel's office in Reno, Nevada. (See copy of delivery order, attached hereto as **Exhibit 7**).  
 15 Despite being told that the check was on its way, Debtors' counsel filed the instant Motion for  
 16 Order to Compel Payment of Attorney Fees on December 14, 2016, now requesting \$5,000.00.  
 17 The check was delivered to Debtors' counsel on December 15, 2016, in the amount of  
 18 \$34,955.50. (See Receipt of Check, attached hereto as **Exhibit 8**).  
 19

## 20 II. LEGAL STANDARD

21 The standard for finding a party in civil contempt is well settled:  
 22

23 The moving part has the burden of showing by clear and convincing evidence that  
 24 the contemnors violated a specific and definite order of the court. The burden  
 25 then shifts to the contemnors to demonstrate why they were unable to comply.  
 26 Stone v. City and County of San Francisco, 968 F. 2d 850, 856 n. 9 (9<sup>th</sup> Cir. 1992). A party's  
 27 inability to comply with a judicial order constitutes a defense to a charge of civil contempt.  
 28 United States v. Rylander, 460 U.S. 752, 757 (1983). Failure to comply consists of not taking  
 "all the reasonable steps within [one's] power to insure compliance with the order[]."

1 Sekaquaptewa v. MacDonald, 544 F.2d 396, 406 (9<sup>th</sup> Cir. 1976).

2 **III. LEGAL ARGUMENT**

3 In the instant matter, Debtors' counsel refused to respond to Ocwen's counsel's multiple  
 4 requests for a W-9 until the actual day the payment for attorney fees was due. When Debtors'  
 5 counsel finally responded and advised that, due to his LLM in taxation, he would refuse to  
 6 provide a W-9, Ocwen had to proceed with additional steps to provide payment. Had Debtors'  
 7 counsel informed Ocwen on November 7, 2016, that he would not be providing a W-9, Ocwen  
 8 still could have made payment prior to the November 28, 2016, deadline. This Court cannot  
 9 reasonably find that Ocwen did not take all reasonable steps to try and comply with the Order.  
 10 At no point in time Ocwen ever indicate that it did not intend to make payment. Indeed, when  
 11 Ocwen's counsel was informed that Debtors' counsel would not provide a W-9, Debtors' counsel  
 12 was informed that "Ocwen is not refusing to pay, we are just looking into reporting requirements  
 13 and whether Ocwen can submit payment to you without a W-9. Ocwen fully intends to pay."  
 14 Thereafter, Ocwen expeditiously worked to submit payment without the W-9, having to  
 15 coordinate with different departments and obtain certain authorizations to break with its  
 16 procedure. On December 12, 2016, Ocwen's counsel Debtors' counsel payment was  
 17 forthcoming, under the impression that this assurance would stave off Debtors' continued threats  
 18 to move to compel payment. Instead, it appears as though the assurance acted as a reminder to  
 19 Debtors' counsel, who thereafter prepared and filed the instant Motion, likely motivated by the  
 20 prospect of additional attorney fees at the high rate of \$500.00 this Court permitted previously.  
 21

22 Ocwen's actions do not warrant the additional payment of damages as requested by the  
 23 Debtors. Indeed, the Debtors are to blame for the delayed payment, as they failed to respond to  
 24 no less than three (3) emails prior to the due date of November 28, 2017. When Ocwen  
 25 discovered this refusal, it immediately began to work toward payment of the award without the  
 26 W-9, which added even additional time to complying with the Court's Order. During this time,  
 27 Debtors' counsel was repeatedly told that Ocwen intended to pay the entire amount of the award  
 28 for attorney fees. Payment, in its entirety, has been made at this time and specifically on

1 December 15, 2016.

2 **V. CONCLUSION**

3 For the aforementioned reasons, Ocwen respectfully requests that this Court deny the  
4 Motion for Order to Compel Payment of Attorney Fees.

5 Dated: January 6, 2017

WRIGHT, FINLAY & ZAK, LLP

6 /s/ Christopher A.J. Swift, Esq.

7 Edgar C. Smith, Esq.

8 Nevada Bar No. 5506

Christopher Alan James Swift, Esq.

Nevada Bar No. 11291

7785 W. Sahara Avenue, Suite 200

Las Vegas, Nevada 89117

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cswift@wrightlegal.net

12 *Attorneys for Ocwen Loan Servicing, LLC*

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## **CERTIFICATE OF SERVICE**

1. On January 6, 2017, I served the following document(s):

**OPPOSITION TO MOTION FOR ORDER TO COMPEL PAYMENT OF ATTORNEY FEES**

2. I served the above-named document(s) by the following means to the persons as listed below:

(Check all that apply)

- a. ECF System (You must attach the "Notice of Electronic Filing", or list all persons and address and attach additional paper if necessary)

SETH J. ADAMS on behalf of Creditor DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR GMACM MORTGAGE LOAN TRUST

sadams@woodburnandwedge.com, NVBK@mccarthyholthus.com

CHRISTOPHER PATRICK BURKE on behalf of Debtor CHRISTOPHER  
MICHAEL MARINO

attyccb@charter.net

CHRISTOPHER PATRICK BURKE on behalf of Joint Debtor VALERIE MARGARET MARINO

attyccb@charter.net

W. DONALD GIESEKE

wdg@renotrustee.com, dgieseke@ecf.epiqsystems.com

U.S. TRUSTEE - RN - 7

USTPRegion17.RE.ECF@usdoj.gov

- b. United States mail, postage fully pre-paid (List persons and addresses. Attach additional paper if necessary)

CHRISTOPHER MICHAEL MARINO  
POB 565  
VERDI NV 89439

VALERIE MARGARET MARINO  
POB 565  
VERDI NV 89439

1            c. Personal Service (List persons and addresses. Attach additional paper if necessary)

2           I personally delivered the document(s) to the persons at these addresses:

3  
4            For a party represented by an attorney, delivery was made by handing the  
5           document(s) to the attorney or by leaving the document(s) at the attorney's office  
6           with a clerk or other person in charge, or if no one is in charge by leaving the  
7           document(s) in a conspicuous place in the office.

8            For a party, delivery was made by handing the document(s) to the party or by  
9           leaving the document(s) at the person's dwelling house or usual place of abode  
10          with someone of suitable age and discretion residing there.

11           d. By direct email (as opposed to through the ECF System) (List persons and  
12          email addresses. Attach additional paper if necessary)

13          Based upon the written agreement of the parties to accept service by email or a court  
14          order, I caused the document(s) to be sent to the persons at the email addresses listed  
15          below. I did not receive, within a reasonable time after the transmission, any electronic  
16          message or other indication that the transmission was unsuccessful.

17           e. By fax transmission (List persons and fax numbers. Attach additional paper if  
18          necessary)

19          Based upon the written agreement of the parties to accept service by fax transmission or  
20          a court order, I faxed the document(s) to the persons at the fax numbers listed below. No  
21          error was reported by the fax machine that I used. A copy of the record of the fax  
22          transmission is attached.

23           f. By messenger (List persons and addresses. Attached additional paper if necessary)

24          I served the document(s) by placing them in an envelope or package addressed to the  
25          persons at the addresses listed below and providing them to a messenger for service.  
26          (A declaration by the messenger must be attached to the Certificate of Service).

27          I declare under penalty of perjury that the foregoing is true and correct.

28          Signed on Friday, January 06, 2017.

29           /s/ Faith Harris

30           An employee of Wright, Finlay & Zak, LLP

WRIGHT, FINLAY & ZAK, LLP  
Edgar C. Smith, Esq.  
Nevada Bar No. 5506  
Christopher Alan James Swift, Esq.  
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[cswift@wrightlegal.net](mailto:cswift@wrightlegal.net)  
*Attorneys for Ocwen Loan Servicing, LLC*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

IN RE:

Case No.: 13-50461-BTB

CHRISTOPHER MICHAEL MARINO, and  
VALERIE MARGARET MARINO.

Chapter 7

## Debtors

**DECLARATION IN SUPPORT OF  
OPPOSITION TO MOTION FOR  
ORDER TO COMPEL PAYMENT OF  
ATTORNEY FEES**

I, Christopher A.J. Swift, Esq., declare under penalty of perjury of the laws of the State of Nevada as follows:

1. I am an attorney of law duly admitted to practice in the State of Nevada and the United States Bankruptcy Court for the District of Nevada.

2. I am an associate attorney with the law firm Wright, Finlay & Zak, LLP, and counsel for Defendant Ocwen Loan Servicing, LLC ("Ocwen") in this matter.

3. I have personal knowledge of the facts and circumstances set forth in this declaration as specified herein and I am competent to testify regarding the below-stated facts if I am called upon to testify in Court.

1       4. I make this Declaration in support of the Opposition to Motion for Order to  
2 Compel Payment of Attorney Fees.

3       5. On November 7, 2016, I emailed Christopher Burke, Esq. requesting a W-9 to  
4 issue payment to Mr. Burke for the court ordered attorney fees. A true and correct copy of the  
5 email is attached as **Exhibit 1**. I did not receive a response.

6       6. On November 8, 2016, I emailed Mr. Burke and again requested a W-9. A true  
7 and correct copy of the email is attached as **Exhibit 2**. I did not receive a response.

8       7. On November 17, 2016, I was in the hospital for family medical reasons. I asked  
9 my assistant to email Mr. Burke again and request a W-9. A true and correct copy of the email is  
10 attached as **Exhibit 3**. There was no response.

11      8. On November 28, 2016, I sent another email asking for a W-9. A true and correct  
12 copy of the email is attached as **Exhibit 4**.

13      9. On November 28, 2016, Mr. Burke responded and refused to provide the W-9. A  
14 true and correct copy of the email is attached as **Exhibit 5**.

15      10. I have practiced law for ten (10) years and have never encountered an attorney  
16 who refused to provide a W-9.

17      11. Due to the refusal, Ocwen and our law firm were forced to take additional  
18 procedural steps to make payment.

19      12. At no point in time did Ocwen ever refuse to make payment to Mr. Burke.

20      13. I called Mr. Burke on December 12, 2016, and left a message indicating that  
21 payment was on its way.

22      14. The remaining exhibits to the Opposition, **Exhibits 6,7, and 8** are true and correct  
23 copies of the originals.

24      //./

25      //./

26      //./

27      //./

28      //./

15. I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated: January 6, 2017

  
Christopher A.J. Swift, Esq.

Christopher A.J. Swift, Esq.

Exhibit 1

Exhibit 1

Exhibit 1

**Christopher Alan James Swift**

---

**From:** Christopher Alan James Swift  
**Sent:** Monday, November 07, 2016 9:17 AM  
**To:** 'attyburke@charter.net'  
**Cc:** Faith K. Harris  
**Subject:** RE: Marino - Attorney Fee Order

Hi Kimberly,

Can you please send me a W-9 so I can get Ocwen to issue the check for the attorney fee/cost award?

Thanks,

Christopher A.J. Swift  
Attorney  
Licensed in California and Nevada



7785 W. Sahara Ave., Suite 200  
Las Vegas, NV, 89117  
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(702) 475-7964 Office  
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**Wright, Finlay & Zak: Your Western  
Regional Counsel for California, Nevada,  
Arizona, Washington, Oregon, Utah, and  
New Mexico**

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---

**From:** [attyburke@charter.net](mailto:attyburke@charter.net) [mailto:[attyburke@charter.net](mailto:attyburke@charter.net)]  
**Sent:** Wednesday, November 02, 2016 5:25 PM  
**To:** Christopher Alan James Swift  
**Subject:** Marino - Attorney Fee Order

Good Evening Mr. Swift,

Please find the attached Order Granting Amended Motion for Attorney Fees and Costs for the above-referenced case. At your earliest convenience, please review the Order, and if agreeable, please sign and send it back so we may upload it with the Court.

Thank you,

Kimberly Wilson, assistant to:

Christopher P. Burke, Esq.

Exhibit 2

Exhibit 2

Exhibit 2

**Christopher Alan James Swift**

---

**From:** Christopher Alan James Swift  
**Sent:** Tuesday, November 08, 2016 4:00 PM  
**To:** 'attyburke@charter.net'  
**Cc:** Faith K. Harris; Edgar C. Smith  
**Subject:** RE: Marino - Attorney Fee Order

Hi Chris,

Please provide me with a W-9 for the attorney fee payment. Also, would you object to a continuance on my client's Opening Brief, currently due November 14, 2016? I need to know in case I need to file a motion for an extension of time this week.

Thanks,

Christopher A.J. Swift  
Attorney  
Licensed in California and Nevada



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Attorney  
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Kimberly Wilson, assistant to:

Christopher P. Burke, Esq.

Exhibit 3

Exhibit 3

Exhibit 3

**Christopher Alan James Swift**

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**From:** Faith K. Harris  
**Sent:** Thursday, November 17, 2016 11:14 AM  
**To:** 'attyburke@charter.net'  
**Cc:** Edgar C. Smith; Christopher Alan James Swift  
**Subject:** RE: Marino - Attorney Fee Order

Good morning,

Following up on the below request for your w-9.

Faith Harris  
Legal Assistant



7785 W. Sahara Ave., Suite 200  
Las Vegas, NV 89117  
(702) 475-7964 Office  
(702) 946-1345 Fax  
[fharris@wrightlegal.net](mailto:fharris@wrightlegal.net)

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Thanks,

Christopher A.J. Swift

Attorney

Licensed in California and Nevada



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**From:** [attycburke@charter.net](mailto:attycburke@charter.net) [mailto:[attycburke@charter.net](mailto:attycburke@charter.net)]

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Kimberly Wilson, assistant to:

Christopher P. Burke, Esq.

Exhibit 4

Exhibit 4

Exhibit 4

**Christopher Alan James Swift**

---

**From:** Christopher Alan James Swift  
**Sent:** Monday, November 28, 2016 10:18 AM  
**To:** Faith K. Harris; 'attyburke@charter.net'  
**Cc:** Edgar C. Smith  
**Subject:** RE: Marino - Attorney Fee Order

Hi Christopher,

This will be my office's third request for a W-9 so that Ocwen can pay the attorney fees. Per the Court Order, the deadline for payment is today. Since we have not received a W-9 at this time, Ocwen cannot make payment. Will you please submit as soon as possible?

**Christopher A.J. Swift**  
Attorney  
Licensed in California and Nevada



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Legal Assistant



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**From:** Christopher Alan James Swift  
**Sent:** Monday, November 07, 2016 9:17 AM  
**To:** 'attyburke@charter.net'  
**Cc:** Faith K. Harris  
**Subject:** RE: Marino - Attorney Fee Order

Hi Kimberly,

Can you please send me a W-9 so I can get Ocwen to issue the check for the attorney fee/cost award?

Thanks,

Christopher A.J. Swift  
Attorney  
Licensed in California and Nevada



7785 W. Sahara Ave., Suite 200  
Las Vegas, NV, 89117  
(702) 666-0632 Direct  
(702) 475-7964 Office  
(702) 946-1345 Fax

**Wright, Finlay & Zak: Your Western  
Regional Counsel for California, Nevada,  
Arizona, Washington, Oregon, Utah, and  
New Mexico**

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---

**From:** attyburke@charter.net [mailto:[attyburke@charter.net](mailto:attyburke@charter.net)]  
**Sent:** Wednesday, November 02, 2016 5:25 PM  
**To:** Christopher Alan James Swift  
**Subject:** Marino - Attorney Fee Order

Good Evening Mr. Swift,

Please find the attached Order Granting Amended Motion for Attorney Fees and Costs for the above-referenced case. At your earliest convenience, please review the Order, and if agreeable, please sign and send it back so we may upload it with the Court.

Thank you,

Kimberly Wilson, assistant to:

Christopher P. Burke, Esq.

Exhibit 5

Exhibit 5

Exhibit 5

**Christopher Alan James Swift**

---

**From:** attycburke@charter.net  
**Sent:** Monday, November 28, 2016 2:30 PM  
**To:** Christopher Alan James Swift  
**Subject:** Marino BK-N-13-50461-BTB

Dear Mr. Swift,

As you are aware, there was a hearing on this motion and Judge Beesley made a ruling. However, the Court's Order did not require the submission of a W-9 prior to payment, nor should it, as one is not required. I have a LLM in Taxation, and would be happy to review any statute, regulation, or private letter ruling contrary to that.

Therefore, please provide confirmation that a check will be sent by tomorrow, so no further motions have to be filed regarding payment pursuant to the Court's Order.

Sincerely,

Christopher P. Burke, Esq.

Exhibit 6

Exhibit 6

Exhibit 6

**OCWEN LOAN SERVICING, LLC**

A/P DISBURSEMENT ACCOUNT  
1661 WORTHINGTON ROAD  
WEST PALM BEACH, FL 33409

BB-BB/113  
JP Morgan Chase Bank N.A.  
712 MAIN AT, RUSK  
HOUSTON, TX 77002

**NO. 1677788**

VENDOR <b>24249</b>	DATE <b>12/09/2016</b>	AMOUNT <b>\$ 34,955.90***</b>
------------------------	---------------------------	----------------------------------

**PAY** \*\*\*Thirty Four Thousand Nine Hundred Fifty Five and 90/100\*\*\*

VOID AFTER 180 DAYS  
APPLY PAYMENT PER THE ATTACHED REMITTANCE ADVICE.

TO **Christopher P.Burke, Esq.**  
THE 702 Plumas Street  
ORDER RENO, NV 89509  
OF

001677788 111300880 06300068684

SIGNATURE HAS A COLORFUL BACKGROUND • BORDER CONTAINS MICROPYTTING

OCWEN LOAN SERVICING, LLC

CHECK DATE: 12/09/2016

VENDOR: 24249

No.: **1677788**

INVOICE	GROSS	DISCOUNT	AMOUNT PAID
12/1/2016 601363107/STLMNT 702 Plumas Street	34,955.90	0.00	34,955.90

TOTALS ..	34,955.90	0.00	34,955.90
-----------	-----------	------	-----------

Exhibit 7

Exhibit 7

Exhibit 7



## MESSENGER INSTRUCTIONS

PHONE (702) 385-5444

FAX (702) 385-1444



NV51618

010 - STANDARD DELIVERY - 4 HRS

## FIRM NAME: &amp; ADDRESS:

WRIGHT FINLAY &amp; ZAK - LITIGATION

7785 W. Sahara Avenue, Suite 200

Las Vegas NV, 89117

PHONE #: (702) 475-7964

FAX #:

CONTACT: Faith Harris EMAIL: fharris@wrightlegal.net

BILLING / FILE #: MARINO 614-2015586

DATE GENERATED #: 12/13/2016

CASE NAME #: VS

CASE #: 13-50461-bib

CUST #: 210007

010 - STANDARD DELIVERY - 4 HRS

DUE DATE #: 12/13/2016

## SPECIAL INSTRUCTIONS:

PLEASE DELIVER CHECK #1677788 TO BURKE, HAVE BURKE SIGN RECEIPT OF CHECK ATTACHED AND RETURN EXECUTED RECEIPT OF CHECK TO WFZ

*RECEIVED  
DEC 13 2016*

BY:

## PICKUP FROM:

Pickup Date/Time: 12/13/2016 7:42 PM

WRIGHT FINLAY &amp; ZAK - LITIGATION

Faith Harris

7785 W. Sahara Avenue, Suite 200

Las Vegas, NV 89117

(702) 475-7964

## Pickup Instructions:

## DELIVER TO:

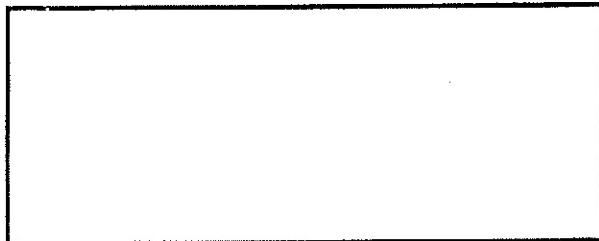
Delivery Date/Time: 12/13/2016

CHRISTOPHER P. BURKE, ESQ.

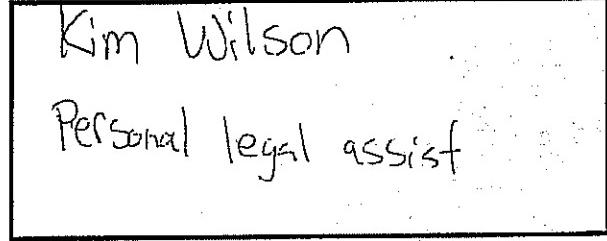
702 Plumas Street

Reno, NV 89509

## Delivery Instructions:

*Task Completed*

SIGNATURE



PRINTED NAME / TIME

10:04am

405 165

12/15/16

Brown Female

Cauc.

5'8"

Order#: NV51618/WORKM

Exhibit 8

Exhibit 8

Exhibit 8

1 WRIGHT, FINLAY & ZAK, LLP  
2 Edgar C. Smith, Esq.  
3 Nevada Bar No. 5506  
4 Christopher Alan James Swift, Esq.  
5 Nevada Bar No. 11291  
6 7785 W. Sahara Avenue, Suite 200  
7 Las Vegas, Nevada 89117  
8 (702) 666-0632; Fax: (702) 946-1345  
9 [cswift@wrightlegal.net](mailto:cswift@wrightlegal.net)  
10 Attorneys for Ocwen Loan Servicing, LLC

7 UNITED STATES BANKRUPTCY COURT  
8 DISTRICT OF NEVADA

9 IN RE:  
10 CHRISTOPHER MICHAEL MARINO, and  
11 VALERIE MARGARET MARINO,  
12 Debtors  
13

Case No.: 13-50461-BTB  
Chapter 7

RECEIPT OF CHECK

14  
15 RECEIPT OF A CHECK of the above regarding Order Granting Amended Motion for  
16 Attorney Fees and Costs in the amount of \$34,955.50 check number 1677788, is hereby  
17 acknowledged this 15 day of December, 2016.

18 *Christopher P. Burke, Esq.*  
19 CHRISTOPHER P. BURKE, ESQ.  
20 702 Plumas Street  
21 Reno, Nevada 89509  
22 Telephone: (775) 333-9277  
23 Attorney for Debtor(s)